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Synpunkter beträffande ERA action points

Kungl. Vetenskapsakademien (KVA) tackar för möjligheten att inkomma med synpunkter på ERA policy agenda actions. Vi väljer här att inleda med några övergripande synpunkter och ger sedan något mer detaljerade synpunkter på ett urval actions. Vi skriver synpunkterna på engelska, i enlighet med de önskemål som uttryckts.

Övergripande synpunkter
The action points aim at fulfilling the ambitions spelled out in the pact for research and innovation in Europe that was decided upon in July 2021. It is thus important that the ERA actions are guided by and drive the values and principles of the pact and that this connection could be more clearly shown under each action. These values and principles are:
- Upholding values: Ethics and integrity of research and innovation; Freedom of scientific research; and Gender equality and equal opportunities for all.
- Working better: Free circulation of researchers, staff, knowledge and technology; Pursuit of excellence; and Value creation and societal and economic impact.
- Working together: Coordination, coherence and commitment; Global outreach; Inclusiveness; and Societal responsibility.

While several of these values and principles are directly translated into specific action points we find that the pursuit of excellence is not emphasized as much as it should. Excellence and quality are of outmost importance and should be emphasized under each action.

Our impression is that there are sometimes too many actions that are suggested, and too much details. The new ERA should be mainly focused on removing barriers, easing procedures, monitoring and, in this way, seeking to push for more and better science and research and for the principles and values of the pact.

Many of the action points are filled with lots of training, policy instruments and activities initiated and controlled on the EU level. This can lead to a centralization of measures of all kinds. The suggested actions are largely addressing staff and structures around research, not research as such. There is a risk that the new ERA will in the end not strengthen European research and innovation but lead to further administrative burden of research and innovation systems on the European and national levels. Too many actions and too much administration programs may result in limiting the space and freedom for individual researchers. Researchers risk being restricted by a huge administrative overhead structure on all levels.

New actions in areas where achievement have already been reached in and between countries may risk fragmenting the European research landscape further. Rather than starting new initiatives we would like to see actions that build on, support and circulate best practice. Many good initiatives to improve for example gender equality and research assessment have been taken across Europe. Well functioning and successful university networks as well as instances of collaboration across research funding bodies are other examples of best practice that could be supported and built upon.

A crucial precondition for all the goals expressed in the pact, such as excellent research and academic freedom, is to secure funding of excellence research at the EU level (e.g. through the ERC). This does not only provide funding for individual projects. Experience shows that national research funding follows successful structures at the EU level. If the EU put more emphasis on excellence, provide resources for excellent and free research and secure good and integral procedures for allocating these resources, it could serve as a template for the member states and beyond. The most efficient way of broadening excellence is to support the instruments that are already in place and that work well (ERC, Marie Curie...). Hence, it is of outmost importance that the proposed actions do not draw resources from funding research at the European level. Funding of the Horizon framework program must first be secured.

Synpunkter på ett urval actions
Vetenskapsakademien har valt att koncentrera mer detaljerade synpunkter till actions 1, 3, and 6. Dessa skickas också in i separata dokument enligt önskemål.

Action1: Enable Open Science including through the European Open Science Cloud
We support the aim of providing European researchers with an accessible, trusted and openly distributed environment where they can publish and exchange each other's data and tools. However, "trusted" is easy to say, but what does it mean in this context? The developments of open science need to be clearly guided by an ambition that it shall support the developments and dissemination of high quality science. A robust system of quality control is key. Quality control needs to be combined with a strong prioritizing of what is meaningful to share and save. Such quality control needs to be researcher driven with strong elements of peer review so that the developments will be supporting high quality science and the dissemination thereof.

In some research areas developments of open science with open sharing of data have advanced considerably. When a more comprehensive system of open science is now to be developed it is of outmost importance that this does not contradict, but build on best practice that has evolved largely through researcher led initiatives.

This action has clear links with action 9. Indeed, research is a global effort and it is important that European procedures – for open science and for other aspects of research – do not set up barriers for international research collaborations with agents in other parts of the world.

The policy agenda for action one is very ambitious and resource demanding. The high ambitions in this area should not be pursued at the expense of supporting research. Ambitions and

timelines need to be adjusted to what is realistic in relation to research funding and research activities.

The often stated aim with open science is to open up for increased exchanges of data and research results both among researchers across the globe and with society at large. The taken initiatives have to be closely monitored in order to see whether they actually open up science, or if new barriers are built.

Action 3: Reform the Assessment System for research, researchers and institutions
Lively discussions on research assessment – to what extent and how they assess quality of research, and what consequences they bring – have been much discussed in the past decades. Much has been done in terms of recommendations, reforms and agreements. The proposed actions could more clearly build on what has already been achieved. In the document, references are made to principles and manifestos, which is good. In addition, the recommendations could build more on reforms and best practice across Europe. Reforms have been pursued – not least in research funding agencies - to come to terms with overreliance on metrics, diversity of research aims, interdisciplinarity etc. and to encourage exchange of best practice. Just to mention a few examples here. A few years ago, the Swedish Research Council formulated a set of principles and guidelines for peer review and at the same time structured training programs, observations and follow up schemes for the review of research applications. Examples of exchange of best practice include two networks of research funding bodies that were formed as so called ERA net as the first ERA initiative was launched, HERA and Norface. Such exchange of best practice is hands on with joint calls, visits to each other and exchange of staff. We would also like to mention that the review procedures in ERC and other parts of the Horizon form role models for others. To change by example is an effective way of changes with less use of resources.

Further comments on the proposed action.
A framework like this one needs to acknowledge the diversity of research aims, research outputs and also of aims and conditions for assessments. In the draft it appears that a lot of emphasis is put on diversity in terms of outputs, but the other aspects of diversity are at least as important. The text in the draft suggests that certain aspects (e.g. open science, societal engagement) are relevant to any kind of research (context), which is not the case. There is a risk with principles of standardizing "across the board" and thereby reducing diversity in research assessment approaches but also research cultures. For example: introducing additional parameters (societal impact, …) might lead to further marginalising blue-sky research (funding). There is no one size fits all approach; the EU provides an example through the different funding schemes themselves: ERC on the one hand and Horizon Europe funding on the other shows attempt to implement different assessment logics.

Different contexts and targets of assessments are mentioned in the draft, but it is unclear what this implies for the principles regarding assessment. Institutional assessments, or assessments of individuals is quite different from assessments of research applications and research publications. While assessments that are leaning too much on output measures and research results may be too limited when seeking to assess the potentials of a young scholar for example,

or research applications, measures of research results may be central to measuring the quality of a research group.

In the draft it is emphasized that much research is interdisciplinary and much research addresses societal challenges and is formed in collaboration with society. This is true, but it is not true for all research. Hence, it is not as important for all assessments to have as a general principle "Assessment practices in research should therefore induce a research culture that values collaboration, open sharing of outputs, engagement with society, and that provides opportunities for multiple talents. (Draft document p. 1 - 2).

Assessments of individuals, groups and institutional units differ of course. And metrics are not all bad, but are very good tools as parts of assessments especially on the more aggregate levels. The draft states that "Joint commitment is needed that goes beyond mere declaration" and "past initiatives to reform research assessment however have often not yielded enough action to drive reform" (draft document p. 2). If we agree that assessments have to vary with kinds of research and with aims of assessments, a general framework cannot be too specific in details.

We welcome the overall spirit of the reform, but recommend to exercise caution not to generalise in the dismissal of metrics which has become more professional over the years. "Metrics" should not be limited to a primitive understanding of it; today it has become a science in itself and increasingly sophisticated. It should be emphasized that not all metrics are "bad" but they need to be used in informed ways, contextualized and usually together with other ways of assessing. Mostly a strategy of combining quality and quantity is suitable. Now, a simplified negative view on metrics in general is expressed in the draft.

Action 6: Protect academic freedom
This topic is certainly of central importance for Europe. There are many aspects to academic freedom and what it entails. Assessing academic freedom only 'with the support of local and national authorities or of relevant national stakeholders' may not be enough. For this action, as for other actions, a researcher led approach appears both more efficient and more supportive of excellent research. Many good initiatives that in several ways address academic freedom have been taken around Europe. Further actions to protect academic freedom can build on these many good initiatives across Europe, for example seminars and conferences, research programs and The Academic Freedom Index (AFi).

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